

1 PHILLIP A. TALBERT
2 United States Attorney
3 MATHEW W. PILE, WSBA 32245
Associate General Counsel
4 Office of Program Litigation, Office 7
ELIZABETH LANDGRAF, CSBN 313184
5 Special Assistant United States Attorney
Social Security Administration
6 6401 Security Boulevard
Baltimore, MD 21235
Telephone: (510) 970-4828
Facsimile: (415) 744-0134
7 Elizabeth.Landgraf@ssa.gov
8 Attorneys for Defendant

9

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12
13 KIMO C. GOMEZ,

14 Plaintiff,

15 v.

16 KILOLO KIJAKAZI,
17 Acting Commissioner of Social Security,

18 Defendant.

No. 1:22-cv-00770-ADA-EPG

ORDER RE: STIPULATION FOR A SECOND
EXTENSION TO FILE DEFENDANT'S
RESPONSE TO PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT

(ECF No. 18).

20 The parties stipulate through counsel that the time for Defendant, the Acting
21 Commissioner of Social Security (the "Commissioner"), to file her response to Plaintiff's Motion
22 for Summary Judgment ("Motion") (ECF No. 16) be extended by twenty-one (21) days, from
23 March 13, 2023, up to and including April 3, 2023.

24 Defendant needs more time because the undersigned attorney for Defendant currently has
25 three district court briefs due between March 13, 2023, and March 17, 2023, the week during
26 which Defendant's brief is due in this case. In addition, the undersigned attorney for Defendant
27 was recently reassigned three additional district court briefs and now has seven briefs due during
28 the remainder of March 2023. The undersigned attorney has been working diligently to meet her

1 current deadlines, including disposing of four district court briefs between March 1, 2023, and
2 March 10, 2023, and has consequently not had sufficient time to devote to Defendant's brief in
3 the present case. Accordingly, the Commissioner respectfully requests an extension of 21 days,
4 until April 3, 2023, to respond to Plaintiff's Motion. This request is made in good faith with no
5 intention to unduly delay the proceedings.

6 The parties further stipulate that the Court's Scheduling Order shall be modified
7 accordingly.

8
9 Respectfully submitted,

10 Dated: March 10, 2023

11 By: */s/ Harvey P. Sackett*
12 HARVEY P. SACKETT
13 (as authorized by email)
14 Attorney for Plaintiff

15 Dated: March 10, 2023

16 STEPHANIE HINDS
17 United States Attorney
18 MATHEW W. PILE
19 Associate General Counsel
20 Office of Program Litigation, Office 7
21 Social Security Administration

22 By: */s/ Elizabeth Landgraf*
23 ELIZABETH LANDGRAF
24 Special Assistant United States Attorney
25 Attorney for Defendant

26 //
27 //
28 //

ORDER

Pursuant to the parties' stipulation (ECF No. 18), IT IS ORDERED that Defendant shall have an extension, up to and including April 3, 2023, to respond to Plaintiff's Motion for Summary Judgment. All other deadlines shall be extended accordingly.

IT IS SO ORDERED.

Dated: March 14, 2023

/s/ *Eric P. Groj*
UNITED STATES MAGISTRATE JUDGE